

-----X	
H. CRISTINA CHEN-OSTER; SHANNA	:
ORLICH; ALLISON GAMBA; and MARY DE	:
LUIS,	:
	:
Plaintiffs,	:
	:
v.	:
	:
GOLDMAN SACHS & CO. and THE	:
GOLDMAN SACHS GROUP, INC.,	:
	:
Defendants.	:
-----X	

I, Robert J. Giuffra, Jr., pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury as follows:

2. Attached hereto as Appendix A is a summary of information related to [REDACTED] operative Separation Agreements compiled from (i) Exhibits 1–866; (i) Exhibit 1 to the Declaration of Michael Becker, dated April 12, 2019 (“Becker Declaration”); and (iii) other voluminous data previously produced to Plaintiffs by Goldman Sachs related to class members’ effective dates of hire.

3. Attached hereto as Appendix B is a summary of information related to 201 operative Managing Director Agreements compiled from (i) Exhibits 867–1096; (ii) Exhibit 1 to the Becker Declaration; and (iii) other voluminous data previously produced to Plaintiffs by Goldman Sachs related to class members’ effective dates of hire.

4. Attached hereto as Appendix C is a summary of information related to 187 operative Private Wealth Advisor Agreements compiled from (i) Exhibits 1097–1284; (ii) Exhibit 1 to the Becker Declaration; and (iii) other voluminous data previously produced to Plaintiffs by Goldman Sachs related to class members’ effective dates of hire and dates of performance reviews.

5. Attached hereto as Appendix D is a summary of information related to 694 operative Equity Agreements compiled from (i) Exhibits 1285–1289; (ii) Exhibit 1 to the Becker Declaration; (iii) Exhibits 2–25 and 60 to the Declaration of Eric Dias, dated April 12, 2019; and (iv) other voluminous data previously produced to Plaintiffs by Goldman Sachs related to class members’ effective dates of hire.

6. Attached hereto as Appendices E-1 to E-7 are summaries of information derived from Appendices A, B, C and D, namely:

- (a) Appendix E-1 is a summary of 647 operative Agreements to arbitrate executed before the filing of the Complaint on September 15, 2010;
- (b) Appendix E-2 is a summary of 67 operative Private Wealth Advisor Agreements executed after the filing of the Complaint, but prior to the class member’s effective date of hire at Goldman Sachs;

(c) Appendix E-3 is a summary of five operative Private Wealth Advisor Agreements executed after the filing of the Complaint, after the start of the class member's effective date of hire, but prior to her first performance review;

(d) Appendix E-4 is a summary of 46 operative Separation Agreements and Managing Director Agreements executed after the filing of the Complaint by class members who had previously executed an arbitration agreement before the filing of the Complaint;

(e) Attached as Appendix E-5 is a summary of [REDACTED] operative Separation Agreements incorporating by reference arbitration clauses in previously executed Managing Director Agreements;

(f) Attached as Appendix E-6 is a summary of 18 operative Separation Agreements executed by class members with individual counsel;

(g) Attached as Appendix E-7 is a summary of 515 class members who executed multiple Equity Agreements.

7. Attached hereto as Appendix F is a summary of all references made by both Plaintiffs and Defendants to agreements to arbitrate in Exhibits 1452–1475 and in other publicly filed documents.

8. Attached hereto are true and correct copies of the following documents:

[REDACTED]

Exhibit 1

[REDACTED]

Exhibit 2

[REDACTED]

Exhibit 3

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Exhibit 4

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Exhibit 5

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Exhibit 600

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Dated: April 12, 2019
New York, New York.

/s/ Robert J. Giuffra, Jr.
Robert J. Giuffra, Jr.